

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., *et al.*

Debtors.

Chapter 11

Case No. 08-35653-KRH

Jointly Administered

Judge Kevin R. Huennekens

**MICHAEL T. CHALIFOUX'S RESPONSE TO
DEBTORS' NINTH OMNIBUS OBJECTION TO CERTAIN
(I) LATE CLAIMS AND (II) LATE 503(B)(9) CLAIMS**

COMES NOW Michael T. Chalifoux ("Chalifoux"), through his undersigned counsel, pursuant to Fed. R. Bankr. P. 3007, Local Bankruptcy Rule 3007-1(D), and this Court's April 1, 2009 Order Establishing Omnibus Objection Procedures and Approving the Form and Manner of Notice of Omnibus Objections [Docket No. 2881], and responds to the Debtors' Ninth Omnibus Objection to Certain (I) Late Claims and (II) Late 503(b)(9) Clams [Docket No. 3509] and states as follows:

Argument

1. For the reasons stated in the Motion of Michael T. Chalifoux to File Late Proof of Claim filed March 20, 2009 ("Chalifoux's Motion") [Docket No. 2676], which is incorporated in its entirety by this reference as if set forth more fully herein, Chalifoux respectfully requests that this Court overrule the Debtors' Ninth Omnibus Objection as it relates to Chalifoux's claim,

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enter its order granting Chalifoux's Motion and allowing his claim in the full amount filed, and awarding Chalifoux such other and further relief as may be proper under the circumstances.

Respectfully submitted this 29th day of June, 2009.

/s/ Richard E. Hagerty
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CERTIFICATE OF SERVICE

This is to certify that on this 29th day of June, 2009, I have served the foregoing ***Response*** (i) electronically or by first-class mail, postage prepaid on the "2002" and "Core" lists and (ii) through the Court's ECF System.

/s/ Richard E. Hagerty
Richard E. Hagerty, VSB No. 47673

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